

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

IN RE: FCA US LLC MONOSTABLE
ELECTRONIC GEARSHIFT
LITIGATION

Case No. 16-md-02744
Honorable David M. Lawson
Magistrate Judge David R. Grand

MDL No. 2744

_____/

TREVOR MARBLE,

Plaintiff,

v.

Case No. 17-10983
Hon. David M. Lawson

FCA US, LLC,

Defendant.

_____/

**FCA US LLC's REPLY IN SUPPORT OF ITS
MOTION FOR LEAVE TO FILE SURREPLY**

Plaintiff's Opposition Brief doubles down on the misrepresentations he made for the first time in his Reply, underscoring why the Court should consider FCA's proposed Surreply. For example, Plaintiff insists that FCA did not "place the issue of pre-sale knowledge as a defense to liability before the Court." Opp'n 2. He claims that "pre-sale knowledge" was never at issue "until the Court's class certification Opinion." *Id.* And he insists that FCA never argued that "predominance was defeated" because determining pre-sale knowledge requires individual inquiries. *Id.* None of that is true, and FCA's Surreply sets the record straight.

CONCLUSION

The Court should grant FCA leave to file the proposed Surreply.

Dated: December 16, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on December 16, 2024, a true and correct copy of the foregoing document was served on all counsel of record.

/s/ Ian Edwards